

EXHIBIT A

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Declaration of Taylor A. Buono

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13 Attorneys for Defendant
 14 DELTA AIR LINES, INC.

15 UNITED STATES DISTRICT COURT
 16 DISTRICT OF NEVADA

17 SUSANA IKA,
 18 Plaintiff,
 19 v.
 20 DELTA AIR LINES, INC.,
 21 Defendant.

Case No. 2:24-cv-02395-CDS-DJA

DECLARATION OF TAYLOR A. BUONO, ESQ. IN SUPPORT OF DEFENDANT'S MOTION TO COMPEL DISCOVERY

17 I, Taylor A. Buono, Esq., declare under penalty of perjury as follows:

18 1. I am over eighteen years of age and have personal knowledge of the matters set forth
 19 in this Declaration, except as to the matters stated upon information and belief, and as to those matters,
 20 I believe them to be true. I could and would competently testify about the information that this
 21 Declaration contains.

22 2. I am an attorney admitted to practice law in the State of Nevada and an Associate at
 23 the law firm of Littler Mendelson. This firm represents Defendant Delta Air Lines, Inc. in this action.

24 3. On August 15, 2025, Defendant served responses and objections to Plaintiff's First
 25 Requests for Production of Documents, which included 36 separate requests.

26 4. On August 18, 2025, Defendant served responses and objections to Plaintiff's Second
 27 Requests for Production of Documents, which included 34 separate requests.

28 5. On around August 15, 2025, Plaintiff requested to meet and confer on Defendant's

1 responses to the First Requests for Production of Documents. Shortly thereafter, she requested to meet
 2 and confer on Defendant's responses to Plaintiff's Second Requests for Production of Documents.

3 6. Pursuant to Plaintiff's requests, Defense counsel told Plaintiff they would be available
 4 to meet and confer on August 22, 2025 at her convenience. Plaintiff did not contact Defense counsel
 5 and did not otherwise follow up until October 21, 2025.

6 7. On October 21, 2025, Plaintiff contacted the undersigned and requested to continue the
 7 meet and confer efforts.

8 8. Plaintiff and the undersigned exchanged several emails, and ultimately agreed to meet
 9 and confer on October 30, 2025.

10 9. During a call on October 30, 2025 involving the undersigned and Plaintiff, Plaintiff
 11 stated that all of the discovery responses were inadequate, though Plaintiff did not identify any specific
 12 requests at issue and stated that she believed the objections raised were generally inappropriate,
 13 without identifying any specific objections or requests. Plaintiff did not offer any arguments to
 14 statements to support that the objections were improper, other than the blanket statement that the
 15 objections were "improper."

16 10. Plaintiff demanded that Defendant "overnight" documents to her.

17 11. The undersigned stated that Defendant would not agree to "overnight" documents.

18 12. I informed Plaintiff that, if she could not identify specific issues with the responses,
 19 beyond the blanket statement that Defendant's objections to the significantly overbroad requests were
 20 improper, that Plaintiff was not satisfying the meet and confer requirement. I attempted to engage in
 21 good faith meet and confer efforts with Plaintiff regarding the discovery requests and attempted to
 22 explain to Ms. Ika that we needed to discuss each request. However, Plaintiff just stated that we must
 23 "overnight" all of the documents she requested. Plaintiff did not provide any argument as to why the
 24 documents she requested were either relevant, not overly broad, or not overly burdensome.

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1 13. Ms. Ika terminated the call with me.

2 I declare under penalty of perjury under the laws of the United States of American and the
3 State of Nevada that the foregoing Declaration is true and correct.

4 Executed this 9th day of December, 2025 in Las Vegas, Nevada.

5 */s/ Taylor A. Buono*

6 TAYLOR A. BUONO, ESQ.

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